



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 11, 2018

BY ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Alain Kaloyeros, et al.*, S2 16 Cr. 776 (VEC)

Dear Judge Caproni:

The Government respectfully writes, with consent of counsel for all June trial defendants, to request a two-week extension of the deadlines for providing Federal Rule of Evidence 404(b) ("Rule 404(b)") notices and filing *in limine* motions and responses for the June trial.

As the Court is aware, the Court previously ordered the following deadlines related to the June trial: (1) Rule 404(b) notices are due on March 13, 2018; (2) motions *in limine* are due on April 4, 2018; and (3) responses to the motions *in limine* are due on May 4, 2018. (Dkt. No. 307.)

In view of the unexpected length of the January trial, the Government respectfully requests that the Court extend each of those deadlines by two weeks, so that (1) Rule 404(b) notices would be due on March 27, 2018; (2) motions *in limine* would be due on April 18, 2018; and (3) responses would be due on May 18, 2018.

The Government has conferred with counsel for each of the June trial defendants, who all consent to the requested deadline extensions.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: Counsel for all defendants (via ECF)